

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PETRÓLEOS DE VENEZUELA, S.A., PDVSA  
PETRÓLEO, S.A., AND PDV HOLDING, INC.,

Plaintiffs,

-against-

MUFG UNION BANK, N.A. and GLAS AMERICAS LLC,

Defendants.

No. 19 Civ. 10023 (KPF)

**NOTICE AND ORDER TO WITHDRAW AS COUNSEL**

PLEASE TAKE NOTICE that upon the accompanying declaration of Sean H. McMahon, and subject to the approval of the Court, Mr. McMahon hereby withdraws as counsel for MUFG Union Bank, N.A. and GLAS Americas LLC and shall be removed from the Case Management/Electronic Case Files (CM/ECF) notification list in the above-captioned matter. MUFG Union Bank, N.A. and GLAS Americas LLC will continue to be represented by Latham & Watkins LLP and Paul, Weiss, Rifkind, Wharton & Garrison LLP in this proceeding.

Dated: August 9, 2023  
New York, New York

**CLARK SMITH VILLAZOR LLP**

By: /s/ Sean H. McMahon

Sean H. McMahon  
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New York, NY 10019  
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SO ORDERED:



Hon. Katherine Polk Failla  
United States District Court Judge

Dated: August 9, 2023  
New York, New York

The Clerk of Court is directed to terminate Mr. McMahon from the docket.

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PETRÓLEO, S.A., AND PDV HOLDING, INC.,

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MUFG UNION BANK, N.A. and GLAS AMERICAS LLC,

Defendants.

No. 19 Civ. 10023 (KPF)

**DECLARATION OF SEAN H. MCMAHON**

1. I am formerly an associate at the law firm of Latham & Watkins LLP, counsel for Defendants MUFG Union Bank, N.A. and GLAS Americas LLC. I submit this declaration in compliance with Local Rule 1.4 to notify the Court that I am seeking to withdraw as counsel because I recently departed Latham & Watkins LLP for Clark Smith Villazor LLP and am no longer an associate at Latham & Watkins LLP.

2. Following my recent departure, Matthew S. Salerno—who remains with Latham & Watkins LLP—and attorneys from Paul, Weiss, Rifkand, Wharton & Garrison LLP, have continued to act as counsel for Defendants. As both firms will continue to represent Defendants, my withdrawal will have no material effect on the schedule in this matter, nor will it cause prejudice to any party.

3. I am not retaining a charging lien.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 9, 2023

/s/ Sean H. McMahon  
Sean. H. McMahon

**CERTIFICATE OF SERVICE**

I hereby certify that, on August 9, 2023, I caused a true and correct copy of the foregoing to be served upon all parties to this litigation via CM/ECF system.

Dated: August 9, 2023

/s/ Sean H. McMahon  
Sean. H. McMahon